

John Balazs, Bar # 157287
Attorney at Law
916 Second Street, Suite F
Sacramento, CA 95814
Tel: (916) 447-9299
balazslaw@gmail.com

Attorney for Defendant
MATTHEW ROBERT ALLISON

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MATTHEW ROBERT ALLISON,

Defendant.

No. 2:24-CR-00257-DC

**APPLICATION FOR SECOND COUNSEL
AND ORDER**

Defendant Matthew Robert Allison, through counsel, hereby applies for an order appointing second counsel under the Criminal Justice Act pursuant to the Sixth Amendment right to effective assistance of counsel and §§ 220.10 and 230.53 of the CJA Guidelines for the appointment of Counsel from the Administrative Office of the United States Courts.

1. Attorney John Balazs was appointed to represent defendant Matthew Allison at the initial appearance in this district on October 10, 2024. ECF No. 21. Mr. Allison was ordered detained at a detention hearing on October 16, 2024. A status conference is set for January 17, 2025.

2. Section 220.10 of the CJA Guidelines states, in relevant part:

“ . . . a person financially eligible for representation should be provided with counsel as soon as feasible after being taken into custody, when first appearing before the court or U.S. magistrate judge, when formally charged, or when otherwise entitled to counsel under the CJA, whichever occurs earliest.”

Section 230.53 of the CJA Guidelines states, in relevant part:

(a) In an extremely difficult case where the court finds it in the interest of justice to appoint an additional attorney, each attorney is eligible to receive the maximum compensation allowable under the CJA.

(b) The finding of the court that the appointment of an additional attorney in a difficult case was necessary and in the interest of justice must appear on the Order of Appointment.

3. This is a difficult case where appointment of a second counsel is necessary and in the interest of justice for a number of reasons.

(a) Defendants Dallas Humber and Matthew Allison are charged with the following 15 counts: conspiracy in violation of 18 U.S.C. § 371 (count 1); solicitation of a hate crime in violation of 18 U.S.C. § 373 (counts 2-5); solicitation of murder of a federal official in violation of 18 U.S.C. § 373 (counts 6-8); doxing of federal officials in violation of 18 U.S.C. § 119 (counts 9-11); interstate threatening communications in violation of 18 U.S.C. § 875(c) (count 12); distribution of information relating to explosives and destructive devices in violation of 18 U.S.C. § 842(p) (counts 13 and 14); and conspiracy to provide material support to terrorists in violation of 18 U.S.C. § 2339A (count 15). ECF No. 1. The Indictment also charges a criminal forfeiture count. *Id.*

(b) The government has represented that discovery is voluminous, totaling 40,000 pages of discovery and ten hours of recordings. Further, the government seized laptops, cellphones, and storage devices from the defendants. Discovery related to these digital devices is forthcoming and not included in the discovery totals listed above.

(c) Codefendant Humber is being represented by the Office of Federal Defender, which has assigned two attorneys, Noa Oren and Andrew Francisco, to represent her.

1 The indictment lists three attorneys as representing the government, Assistant U.S. Attorney
2 Angela L. Scott, U.S. DOJ Special Litigation Counsel Christopher J. Perras, and U.S. DOJ Trial
3 Attorney Jacob Warren.

4 4. CJA attorney Kyle Knapp is available and willing to accept appointment as second
5 counsel. CJA Panel Administrator Kurt Heiser approves of this request.

6 Respectfully submitted,

7 Dated: October 22, 2024

8 /s/ John Balazs
JOHN BALAZS

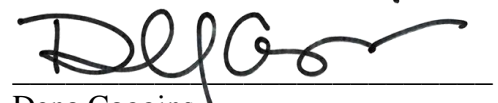
9 Attorney for Defendant
10 MATTHEW ROBERT ALLISON

11
12
13 **ORDER**

14 Having satisfied the Court that the defendant is financially unable to retain counsel and
15 that the appointment of an additional attorney in this difficult case is necessary and in the interest
16 of justice, IT IS HEREBY ORDERED that attorney Kyle Knapp is appointed as second-counsel
17 to represent defendant Matthew Robert Allison in the above-captioned case.

18
19 IT IS SO ORDERED.

20 Dated: October 28, 2024

21 
22 Dena Coggins
23 United States District Judge
24
25
26
27
28